

December 9, 2009

Ms. Laura Sinram  
Senior Campaign Finance Analyst  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated November 4, 2009 regarding our 2009 September Monthly FEC report.

The Committee believes its procedures are in compliance with the best efforts and donor identification provisions cited in your letter. As an initial matter, all committee solicitations request the donor's first name, middle initial, and last name; notify the donor that the Committee is required to report occupation and employer information; and request that the donor provide such information. For those donors who choose not to provide the occupation and employer information, the Committee (within thirty days of receiving the contribution) sends the required follow-up letter, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation to report the information. These follow-up letters include a postage-paid return envelope for the donor's convenience. Finally, all such information received, including the contributor's address, is reported.

Any additional information received subsequent to the filing of the original report will be included on amendments to be filed by the Committee.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The Committee has reported all the donor identification information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from any identification information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. In addition, the Committee notes that it updates its employer/occupation data as it is received from donors.

The Committee has reviewed all reimbursements to individuals for travel and subsistence and can as you requested confirm that no further itemization is required under any Commission regulations for these expenditures.

Suresh Nair contributed \$ 500 on 8/10/09, made via a personal credit card. Then the donor requested a full refund, and on 8/28/09, the Committee issued a refund check for \$ 500. Subsequently, the Committee was notified that the donor had initiated a chargeback for the \$ 500 credit card donation, and the \$ 500 debit was charged to the Committee on 8/11/09. The Committee was not notified of the chargeback until September, after the refund check had already been cashed. The chargeback was reported on Schedule A of this report as a negative entry, as referenced in your letter. The Committee has contacted Suresh Nair regarding this matter.

Dr. A. Gehring contributed \$ 300 on 8/4/09, made via a personal credit card. Then the donor requested a full refund, and on 8/28/09, the Committee issued a refund check for \$ 300. Subsequently, the Committee was notified that Dr. Gehring had initiated a chargeback for the \$ 300 credit card donation, and the \$ 300 debit was charged to the Committee on 8/28/09. The Committee was not notified of the chargeback until September, after the refund check had already been cashed. The chargeback was reported on Schedule A of this report as a negative entry, as referenced in your letter. The Committee

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